ENGINEERING STATEMENT

At the request, and on the behalf of VICTORY CHRISTIAN CENTER, INCORPORATED I am presenting the following engineering information looking towards an application for Channel 224A at Harrisburg, North Carolina. My qualifications as an electrical engineer are a matter of public record with the Commission.

This application is completely unremarkable in engineering and law, with the customary class 'A' maximum lawful facilities of six kilowatts, H & V, and a height above average terrain (HAAT) of 100 metres. The basis for calculating the requirements of spacing and HAAT may be found in Exhibits EE, Figures 1 and 3 inclusive.

EXHIBIT EE FIGURE 1 demonstrates the proposed operation is grossly short-spaced to an experimental (but not operational) FM at Charlotte, North Carolina. (WHYC, file BPEX-891218MK). Inasmuch as experimental FM operations are allocated on a secondary basis, and the FCC database show that WHYC have been relocated to 93.3 or 98.9 mc, there is no problem or shortspacing issue with respect to this experimental FM at Charlotte, NC. This figure also demonstrates that it is shortspaced to its own allocation for obvious reasons. In every other respect the application complies fully with 47CFR 73.207 of the Rules with ample clearances and accordingly this proposal is eligible for maximum 6 kw power and 100 m HAAT under the present spacing and power rules and without any special processing or disposition.

EXHIBIT EE FIGURE 2 presents the basis for HAAT calculation. The online facilities of the Defence Mapping Agency weree used to determine, with a digitised database of 3 second accuracy and linear interpolation, the HAAT for the 8 cardinal radials and the principal community (Harrisburg, NC) radial which falls on 60.9° True. The direct radial is plotted through the geographic centre of Harrisburg inclusive of its 1-mile extraterritorial zoning limit under Cabarrus County municipal law. The City of Harrisburg is delivered the required 3.16 mv/m (70 dBuV) over and beyond its entire extent.

EXHIBIT EE FIGURE 3 shows the distances calculation to the pertinent contours in support of graphic exhibits.

Proposed studio location. It is proposed to locate the main studio at the present studios of WOGR(AM) Charlotte, Nc. By handheld global positioning system techniques the distance from the proposed FM transmitter site and the proposed studios at 1501 I-85 Service Road N. is calculated to be 9.5 km, well within the 70 dBuV contour of the proposed operation. This is also shown on Exhibit 5 of the engineering (the studios are plotted on this map).

In summary, we have presented conclusive proof that the WOGR(AM) studio site meets the siting requirements in that these facilities are located within the proposed 70 dBuV contour.

A highly detailed NIER and RIOTIE statement is presented for the completeness of the record. The applicant has assured this firm that they will be retained, and based on the author's personal experience with WOGR over many years in their hire, that should annoying or obnoxious effects occur as a result of the proposed station that all deliberate speed and effort will be expended to resolve interference conflicts or complaints.

It should be noted that the entire blanketing contour lies over property which is zoned I-1 or B-2, i.e. definitely not residential. We expect that there will be no blanketing interference problems.

I certify under penalty of perjury that I personally prepared the statements and exhibits contained herein, and that the statements and representations made are true to the best of my knowledge and belief.

23.3.92

York David Anthony
Consulting Engineer
Victory Christian Center, Incorporated

This the 23rd day March, 1992

FM Spacing study

Title: Victory Christian Center Latitude: 35-17-22
Channel 224A (92.7 MHz) Longitude: 80-45-36
Database: DW 03/17/92 Safety zone: 50 km

Call City of License	Auth	Licensee name St FCC File no.	Chan Freq	ERP-kW EAH-m	Latitude Longitude	Br-to -from	Dist. (km)	Req. (km)
WQXX MORGANTON	LIC	COOPER BROADCASTING COMP NC BMLH-900123KC	221A 92.1	6 100	35-45-09 81-43-19	300.9 120.3	101.3 70.26	31 CLEAR
WKRR ASHEBORO	LIC	DICK BROADCASTING CO INC NC BLH-851227KB	222C 92.3	100DA 393	35-49-59 79-50-02	53.9 234.5	103.4 8.382	95 CLOSE
WESC-FM GREENVILLE	LIC	BCG COMPANY OF THE CAROL SC BLH-800811AB	223C 92.5	100 610	35-08-16 82-36-31	264.8 83.7	169.2 4.158	165 CLOSE
WHLZ MANNING	LIC	CLARENDON COUNTY BROADCA SC BLH-860312KD	223C 92.5	100 357BT	33-32-05 79-59-15	159.8 340.3	207.2 42.20	165 CLEAR
WYHC CHARLOTTE	CP	MHS HOLDINGS LIMITED PAR NC BPEX-891218MK	224A 92.7	.08DA 41	35-16-37 80-50-02	258.3 78.3	6.863 -108	115 SHORT
ALLOC HARRISBURG		NC DOC-89-594	224A 92.7		35-20-26 80-41-30	47.2 227.2	8.455 -107	115 SHORT
Granted effective 02/24/92, adopted 12/31/91, released 01/09/92; Filing window 02/25-03/26/92; SITE RESTRICTION 2.7 MI NW								
WZNS DILLON	LIC	KAT BROADCASTING CORPORA SC BLH-860814KB	225C 92.9	100 549	34-21-53 79-19-49	127.8 308.6	166.2 1.224	165 CLOSE
WMQX-FM WINSTON-SALEM	LIC	RALPH C GUILD NC BLH-880310KA	226C 93.1	100 335BT	36-16-33 79-56-27	33.7 214.2	132.1 37.15	95 CLEAR
WBBO-FM FOREST CITY	LIC	RUTHERFORD COUNTY RADIO NC BLH-871214KB	227C 93.3	92.9 619	35-16-19 82-14-00	269.6 88.7	134.1 39.05	95 CLEAR
NEW LENOIR	APP	MARIA M OCHOA NC BPH-890615ME	277A 103.3	.74 204	35-58-30 81-32-58	317.1 136.7	104.4 94.40	10 CLEAR
WMTY-FM GREENWOOD	ORD	UNITED COMMUNITY ENTERPR SC	278C3 103.5		34-09-28 82-07-42	225.2 44.4	177.4 165.4	12 CLEAR
DOC-89-404; ORDERED FROM 278A; Call Granted 03/09/89								

>> End of channel 224A study <<

Lambert & Anthony
Concord, North Carolina

March 22, 1992

Terrain Averages from DMA 3-second Database

Job Title: Victory Christian Center, Inc.
Center of Radiation 313.7 m (1029.2 ft) A.M.S.L.

Latitude: 35-17-22
Longitude: 80-45-36

	Bearing (Degrees true)	3.0 to 16.0 kilometer average terrain elevation (meters)	(feet)	Height above average terrain (meters)	(feet)
	.0	211.5	693.9	102.2	335.3
*	15.0	205.1	672.9	108.6	356.3
*	30.0	196.1	643.4	117.6	385.8
	45.0	188.5	618.4	125.2	410.8
*	60.0	183.6	602.4	130.1	426.8
*	60.9	183.9	603.3	129.8	425.9
*	75.0	180.5	592.2	133.2	437.0
	90.0	189.7	622.4	124.0	406.8
*	105.0	197.0	646.3	116.7	382.9
*	120.0	201.5	661.1	112.2	368.1
	135.0	215.1	705.7	98.6	323.5
*	150.0	215.8	708.0	97.9	321.2
*	165.0	219.0	718.5	94.7	310.7
	180.0	220.9	724.7	92.8	304.5
*	195.0	215.3	706.4	98.4	322.8
*	210.0	215.6	707.3	98.1	321.9
	225.0	220.8	724.4	92.9	304.8
*	240.0	219.0	718.5	94.7	310.7
*	255.0	219.8	721.1	93.9	308.1
	270.0	228.2	748.7	85.5	280.5
*	285.0	229.1	751.6	84.6	277.6
*	300.0	227.7	747.0	86.0	282.2
	315.0	235.0	771.0	78.7	258.2
*	330.0	229.6	753.3	84.1	275.9
*	345.0	219.2	719.2	94.5	310.0
	Average:	213.7	701.1	100.0	328.1

* = Radial not included in average

Average (9) radials:	211.9	695.2 C/R AMSL	311.9	1023.3
Average (12) radials:	211.6	694.2 C/R AMSL	311.6	1022.3
Average (18) radials:	211.7	694.6 C/R AMSL	311.7	1022.6
Average (24) radials:	211.8	694.9 C/R AMSL	311.8	1023.0
Average (36) radials:	211.6	694.2 C/R AMSL	311.6	1022.3
Average (72) radials:	211.5	693.9 C/R AMSL	311.5	1022.0

EXHIBIT EE FIGURE 3

Lambert & Anthony
Concord, North Carolina

March 22, 1992

Service contours based on FCC F(50,50) curves

Title: Victory Christian Center, Inc. Latitude: 35-17-22
Channel: 224 C/R 313.7 meters (1029.2 feet) A.M.S.L. Longitude: 80-45-36

Bearing (degrees)	HAAT (meters) (feet)	ERP (kiloWatts) (dBk)	70 dBu (3.16 mV/m) contour	60 dBu (1 mV/m) contour	54 dBu (.50 mV/m) contour
.0	102.2	6.000	16.4 km	28.6 km	39.1 km
* 15.0	108.6	6.000	17.0 km	29.4 km	40.1 km
* 30.0	117.6	6.000	17.7 km	30.5 km	41.3 km
45.0	125.2	6.000	18.3 km	31.3 km	42.3 km
* 60.0	130.1	6.000	18.6 km	31.8 km	43.0 km
* 60.9	129.8	6.000	18.6 km	31.8 km	42.9 km
* 75.0	133.2	6.000	18.9 km	32.2 km	43.4 km
90.0	124.0	6.000	18.2 km	31.2 km	42.2 km
* 105.0	116.7	6.000	17.7 km	30.4 km	41.2 km
* 120.0	112.2	6.000	17.3 km	29.9 km	40.6 km
135.0	98.6	6.000	16.0 km	28.1 km	38.5 km
* 150.0	97.9	6.000	16.0 km	28.0 km	38.4 km
* 165.0	94.7	6.000	15.7 km	27.6 km	37.8 km
180.0	92.8	6.000	15.5 km	27.3 km	37.5 km
* 195.0	98.4	6.000	16.0 km	28.1 km	38.5 km
* 210.0	98.1	6.000	16.0 km	28.1 km	38.4 km
225.0	92.9	6.000	15.5 km	27.3 km	37.5 km
* 240.0	94.7	6.000	15.7 km	27.6 km	37.8 km
* 255.0	93.9	6.000	15.6 km	27.5 km	37.7 km
270.0	85.5	6.000	14.8 km	26.3 km	36.1 km
* 285.0	84.6	6.000	14.7 km	26.2 km	35.9 km
* 300.0	86.0	6.000	14.9 km	26.4 km	36.2 km
315.0	78.7	6.000	14.2 km	25.3 km	34.8 km
* 330.0	84.1	6.000	14.7 km	26.1 km	35.9 km
* 345.0	94.5	6.000	15.7 km	27.6 km	37.8 km

38,51d

HAAT: 100.0

Total Population (1980 Census):	288,863	531,789	683,326
Total Population (1980 Corr.):	288,861	531,791	683,344
Total Population (1986 Update):	321,373	587,572	750,557
Area (Square km):	838.4	2551.1	4752.3

EXHIBIT 1
VICTORY CHRISTIAN CENTER
NEW FM, HARRISBURG, NC
FAA FILING

☆ U. S. GOVERNMENT PRINTING OFFICE: 1985—494-355

DO NOT REMOVE CARBONS

Form Approved OMB No. 2120-0001

U.S. Department of Transportation
Federal Aviation Administration

NOTICE OF PROPOSED CONSTRUCTION OR ALTERATION

Aeronautical Study Number

1. Nature of Proposal

A. Type	B. Class	C. Work Schedule Dates
■ New Construction	☒ Permanent	Beginning PENDING
☐ Alteration	☐ Temporary (Duration _____ months)	End FCC GRANT

2. Complete Description of Structure

A. Include effective radiated power and assigned frequency of all existing, proposed or modified AM, FM, or TV broadcast stations utilizing this structure.

B. Include size and configuration of power transmission lines and their supporting towers in the vicinity of FAA facilities and public airports.

C. Include information showing site orientation, dimensions, and construction materials of the proposed structure.

300' AGL STEEL TOWER
6 KW H & V RADIATION
92.7 mc (CHN 224) FM BCDST
5 BAYS CIRC POLARISATION
HAGL CENTER RAD 82 M HAAT 100M

(if more space is required, continue on a separate sheet.)

3A. Name and address of individual, company, corporation, etc. proposing the construction or alteration. *(Number, Street, City, State and Zip Code)*

(704) 393 1540
area code Telephone Number

VICTORY CHRISTIAN CENTER, INCORPORATED
1501 N I-85 SERVICE ROAD
CHARLOTTE, NC 28216

B. Name, address and telephone number of proponent's representative if different than 3 above.

(704) 597 8317
YORK DAVID ANTHONY (SAME ADDRESS)

4. Location of Structure

A. Coordinates *(To nearest second)*	B. Nearest City or Town, and State	C. Name of nearest airport, heliport, flightpark or seaplane base
	CHARLOTTE , NC	WILGROVE
35° 17' 22" Latitude	(1) Distance to 4B (WITHIN) Miles	(1) Distance from structure to nearest point of nearest runway 7.3 mi
80° 45' 36" Longitude	(2) Direction to 4B (WITHIN)	(2) Direction from structure to airport 135.9°

5. Height and Elevation *(Complete to the nearest foot)*

A. Elevation of site above mean sea level	760
B. Height of Structure including all appurtenances and lighting *(if any)* above ground, or water if so situated	300
C. Overall height above mean sea level *(A + B)*	1060

D. Description of location of site with respect to highways, streets, airports, prominent terrain features, existing structures, etc. Attach a U.S. Geological Survey quadrangle map or equivalent showing the relationship of construction site to nearest airport(s). *(if more space is required, continue on a separate sheet of paper and attach to this notice.)*

100 meters (330 feet) NW of US Highway 29 near the end of Tyner Street, Charlotte, North Carolina (adjacent to 7920 Tyner Street)

Notice is required by Part 77 of the Federal Aviation Regulations (14 C.F.R. Part 77) pursuant to Section 1101 of the Federal Aviation Act of 1958, as amended (49 U.S.C. 1101). Persons who knowingly and willingly violate the Notice requirements of Part 77 are subject to a fine (criminal penalty) of not more than $500 for the first offense and not more than $2,000 for subsequent offenses, pursuant to Section 902(a) of the Federal Aviation Act of 1958, as amended (49 U.S.C. 1472(a)).

I HEREBY CERTIFY that all of the above statements made by me are true, complete, and correct to the best of my knowledge. In addition, I agree to obstruction mark and/or light the structure in accordance with established marking & lighting standards if necessary.

Date	Typed Name/Title of Person Filing Notice	Signature
19 MAR 1992	YORK DAVID ANTHONY CONS ENGINEER	

FOR FAA USE ONLY *FAA will either return this form or issue a separate acknowledgement.*

The Proposal:

- ☐ Does not require a notice to FAA.
- ☐ Is not identified as an obstruction under any standard of FAR, Part 77, Subpart C, and would not be a hazard to air navigation.
- ☐ Is identified as an obstruction under the standards of FAR, Part 77, Subpart C, but would not be a hazard to air navigation.
- ☐ Should be obstruction ☐ marked, ☐ lighted per FAA Advisory Circular 70/7460-1, Chapter(s) _____
- ☐ Obstruction marking and lighting are not necessary.

Remarks:

Supplemental Notice of Construction FAA Form 7460-2 is required any time the project is abandoned, or

- ☐ At least 48 hours before the start of construction.
- ☐ Within five days after the construction reaches its greatest height.

This determination expires on _____ unless:

(a) extended, revised or terminated by the issuing office;
(b) the construction is subject to the licensing authority of the Federal Communications Commission and an application for a construction permit is made to the FCC on or before the above expiration date. In such case the determination expires on the date prescribed by the FCC for completion of construction, or on the date the FCC denies the application.

NOTE: Request for extension of the effective period of this determination must be postmarked or delivered to the issuing office at least 15 days prior to the expiration date.

If the structure is subject to the licensing authority of the FCC, a copy of this determination will be sent to that Agency.

Issued In	Signature	Date

FAA Form 7460-1 (8-85)

DO NOT REMOVE CARBONS

System Specification

Antenna: Comark 5 bay
circ polarised
omnidirectional

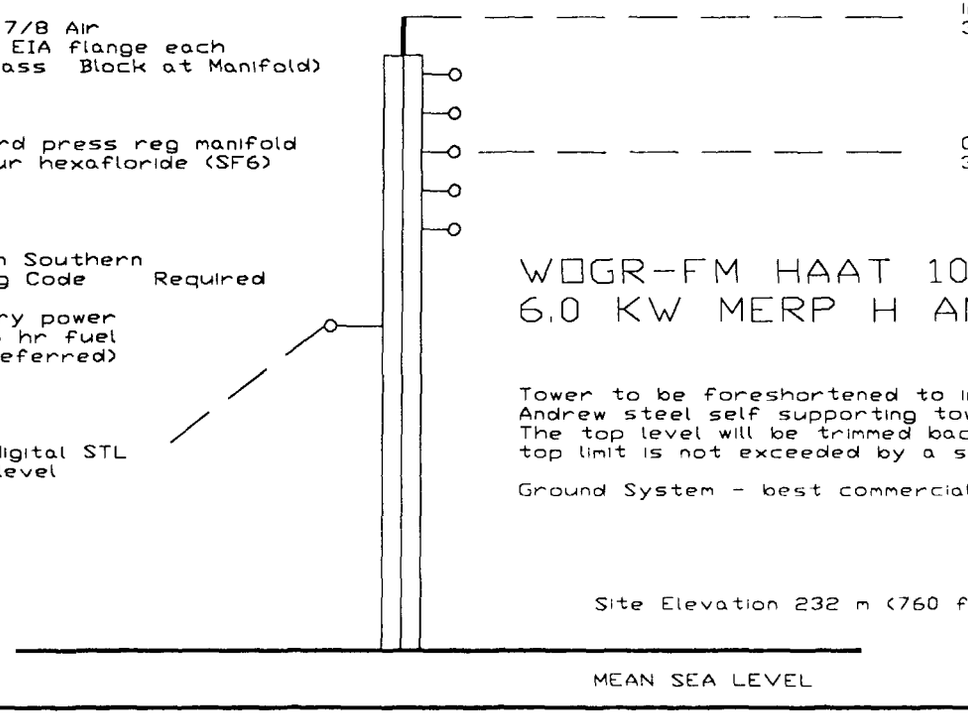
Cable: Andrew 7/8 Air
1 5/8 EIA flange each
Gas Pass Block at Manifold)

Press: Standard press reg manifold
sulphur hexafloride (SF6)

Compliance with Southern
Uniform Building Code Required

12 kVa auxiliary power
specified w/36 hr fuel
cell (diesel preferred)

23 gc/s digital STL
150 foot level



NOT TO ANY SCALE

NOT FOR CONSTRUCTION

Lambert & Anthony, Consulting Engineers
2613 Craig Avenue
Concord, North Carolina 28027
USA (01) 704 786 8874

TOWER PLAN SKETCH

Exhibit Figure Victory Christian Center

NEW FM, Harrisburg, North Carolina

Site Coordinates N 35-17-22 W 80-45-36	SIZE A	FSCM NO	DWG NO EXHIBIT II (D930319AC) REV 01
March 19, 1992	SCALE none	23.3.92	SHEET 1 of 1

EXHIBIT 3
VICTORY CHRISTIAN CENTER, INCORPORATED
NEW FM, HARRISBURG, NORTH CAROLINA

The following study is presented to demonstrate compliance with the Commission's concerns addressed in question #14 of Form 301, Section V-B.

1. 60 Meters Within Transmit Antenna

There is nothing other than the supporting structure within 200 meters of the transmitting antenna. There is a cellular telephone tower approximately 225 meters away, but inasmuch as they operate at nearly 10 times the frequency of the proposed FM station, no interaction could possibly be expected.

2. Government/Commercial Receiving Stations

The blanketing contour is calculated by the square root of the total power (12 kw, 6 horizontal and 6 vertical) and multiplying by the constant 0.394. This yields a blanketing contour of 115 dBuV at 1.4 km distant from the antenna radiation center.

Other than the aforementioned cellular tower (which is 225 meters distant) there is a receiving station operated by the Microelectronics Center of North Carolina which is under the trusteeship of the Consolidated University of North Carolina system. It is 1.63 km distant at 44.17°T from the proposed site.

The MCNC tower is located at 35-18-00 and 80-44-51. The author of this report was a former student at the MCNC member institution UNC-Charlotte in undergraduate electrical engineering at the time the tower was erected. To the best of our knowledge and belief it supports ITFS equipment for the Consolidated University remote lecturing equipment and the police radio (400 mc) for the UNC-C campus police.

There is another 'ad hoc' tower which is located in a residential area of 161 feet which is not in the FAA database that was obtained by visual inspection of the area. This tower was operated by a (now deceased) paving contractor in the 160 mc business band, and also has some paging equipment on it at a low level to service IBM in the nearby University Research Park. It lies within the blanketing contour (approximately 0.74 km distant at 80°T, determined by handheld GPS and not survey) but there should be no objectionable interference to this facility if it is in fact in use. (The author had a conversation with the son of the deceased tower's owner in

anticipation of this report. He is Richard Thomas, who can be reached at (704) 596 3900, and who has been briefed on the proposed construction and where our office can be reached in the highly unlikely event that the proposed Channel 224A FM would cause his tenants problems.

3. Expected RITOIE and Overload Effects

The area to locate Channel 224A and be fully spaced is in an area rich with existing FM and TV stations. An exhaustive analysis is offered to demonstrate that there would be no harmful effect to either other stations or to even minimally functioning radio and television receivers.

The RITOIE stations considered within 10 km are as follows:

1.	BPET-901217KE WTVI Charlotte (BPET-901217KE is an upgrade app for WTVI)	5.8 km @ 42° 9.6 km @ 197	Channel 42 - 639.25 vis 653.75 aur Visual sum - falls in channel 57 Aural sum - falls in channel 58 1.2 mc removed from vision 58 Visual diff- falls in channel 26 Aural diff - falls in channel 26
2.	WSOC-FM	4.3 km @ 136°	103.7 mc + RITOIE = 114.7 - RITOIE = 81.7
3.	WMXC-FM (104.7)	7.9 km @ 122°	+ RITOIE = 116.7 - RITOIE = 80.7
4.	WFAE	7.9 km @ 122	90.7 mc + RITOIE = 88.7 - RITOIE = 94.7
5.	WSOC-TV	6.0 km @ 135	187.25 mc visual 191.75 mc aural IM = 94.55 visual 99.05 aural 2nd Harm 92.7 = 185.4 mc (+1.85 above visual car) Third order (2x92.7 - vis = 90.85 mc)

Summary: Case 1 is a UHF-TV operating in Channel 42. The blanket contours do not overlap. There is a component which would fall within 1.2 mc of channel 58's vision carrier at Concord. Inasmuch as UHF tuners are involved in this situation it is almost impossible to envision that even the worst TV set would have receiver-induced intermodulation between Channel 42 and the proposed 92.7 that would fall within channel 58. The applicant certifies that he will install a trap at no charge to any viewer with a TV-58 problem.

Summary continued. Case 2 (WSOC-FM) is a 100 kw fm in 103.7. The sum product falls outside the FM band. The difference product falls within TV channel 5. The nearest TV-5 station is at Raleigh, NC which is 97 km distant from the blanketing contour. No RITOIE is expected from the proposed operation.

Case 3 (WMXC) is a 100 kw fm on 104.7. The sum product falls outside the FM band. The difference falls within channel 5. No interference is expected as in the case of Case 2.

Case 4 (WFAE) is a 100 kw fm in 90.7. The sum product falls on 88.7 mc which is an adjacent channel of WNSC(FM) Rock Hill, South Carolina which operate in 88.9 mc. The blanketing contour of the proposed operation lies barely within the 60 dBuV contour of WNSC. The blanketing contours of WFAE and the proposed operation do not overlap. No effect to reception of WNSC is anticipated. Should there be a problem the applicant certifies that traps or a proper receiver will be provided to affected parties wishing to receive WNSC at no charge.

Case 5 involves a VHF-TV station (WSOC, Channel 9) with 316 kw visual. The difference (straight) of the proposed operation from the visual carrier falls on 94.55 mc and from the aural carrier on 99.05 mc. Neither of these channels are in use (the nearest 94.5 is at Eden, NC, nearly 120 km away, and 99.1 at Fayetteville, nearly 130 km away).

The second harmonic of the proposed operation falls 1.85 mc above the vision carrier of WSOC-TV. It is conceiveable that a TV RF amplifier could produce a 1.85 visual carrier beat on a receiver tuned to channel 9. Most functioning TV sets have an FM trap which is highly effective in preventing this interference but should complaints arise the applicant certifies that it will provide traps or other remedial measures to prevent fouling channel 9.

4. Other Matters

There is a cable headend 12 km distant from the proposed operation which could experience second harmonic interference in channel 9. A notch trap installed in the headend will eliminate this problem and the applicant certifies that it will provide traps at no charge to this headend.

The applicant also certifies that all complaints of blanketing interference will be satisfied with and beyond the requirements of FCC rules in effect at the time of grant.

EXHIBIT 4
VICTORY CHRISTIAN CENTER, INCORPORATED
NEW FM, HARRISBURG, NORTH CAROLINA (CHANNEL 224)

DERITA, NC TOPOGRAPHIC MAP (7.5 MINUTE, NAD 27)

The entire map has been replicated in each copy of the application. It is attached to the REAR COVER of this exhibit.

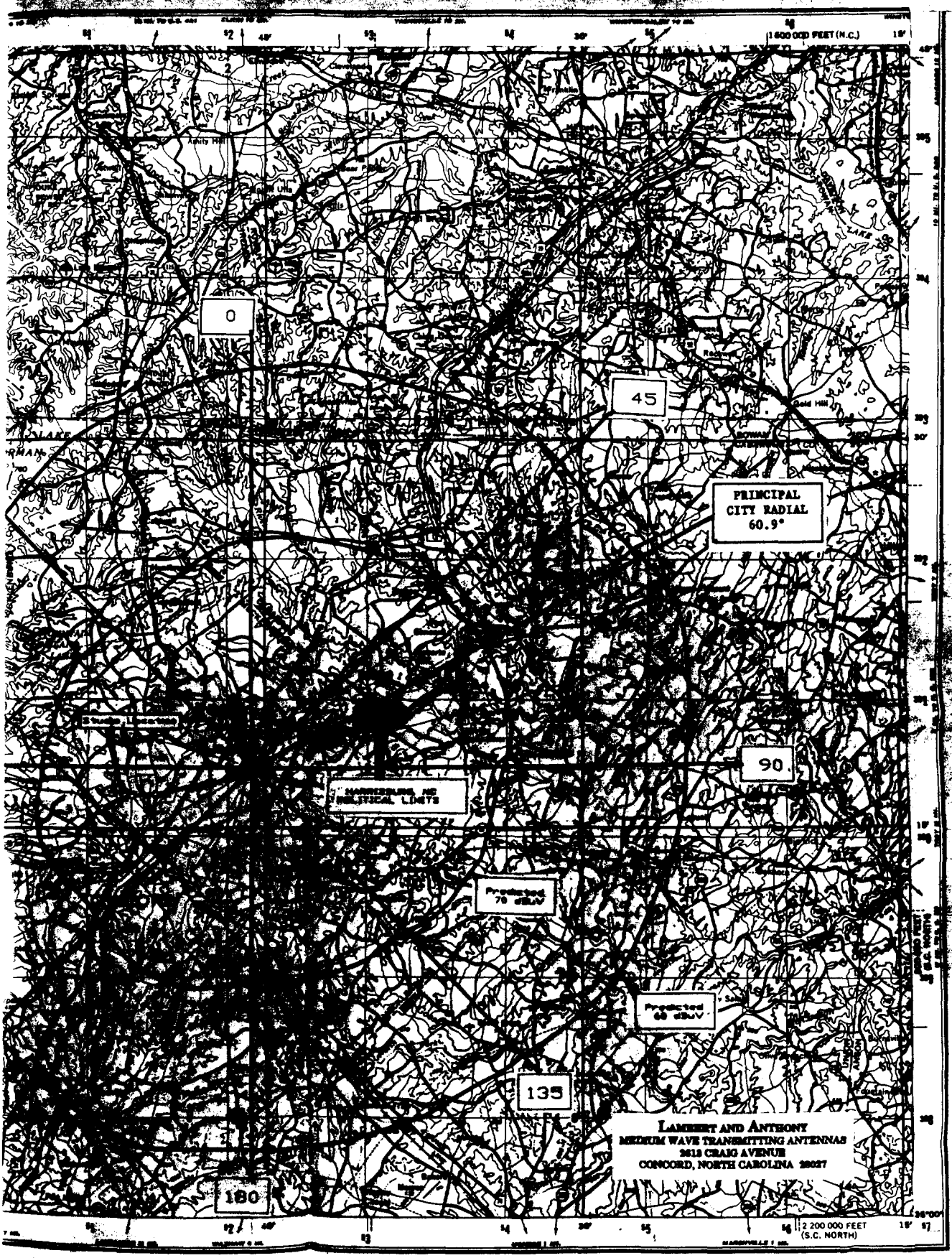
VICTORY CHRISTIAN CENTER, INC
NEW FM, Harrisburg NC

EXHIBIT EE-4 FIGURE 2
PROPOSED VCC SITE

N 35-17-22
W 80-45-26

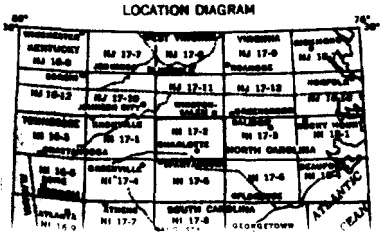
PROPOSED SITE

LAMBERT AND ANTHONY
MEDIUM WAVE TRANSMITTING ANTENNAS
2613 CRAIG AVENUE
CONCORD, NORTH CAROLINA 28027



10 0 10 20 Statute Miles
20 0 20 30 Kilometres
10 Nautical Miles

LOCATION DIAGRAM

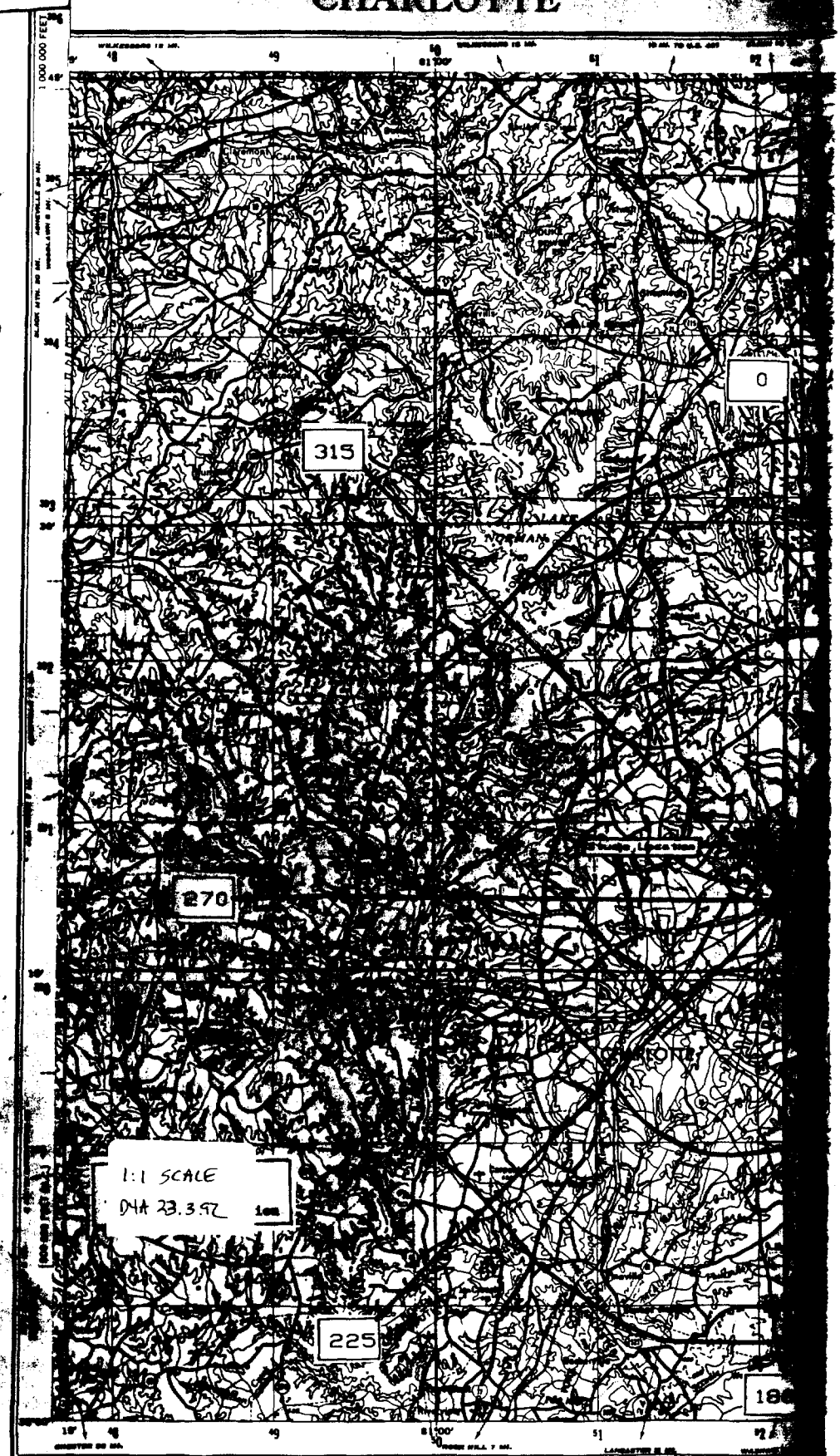


VICTORY CHRISTIAN CENTER, INC
NEW FM, Harrisburg NC

EXHIBIT 5 FIGURE 1

1:250,000 USGS Charlotte Quad
Principal Coverage Showing

CHARLOTTE



Scale 1:250,000

CONTOUR INTERVAL 100 FEET WITH
SUPPLEMENTARY CONTOURS AT 50 FOOT INTERVALS

TRANSVERSE MERCATOR PROJECTION

BLACK NUMBERED LINES INDICATE THE 10,000 METRE UNIVERSAL TRANSVERSE MERCATOR GRID, ZONE 17

EXHIBIT 6
VICTORY CHRISTIAN CENTER, INCORPORATED
NEW FM, HARRISBURG, NORTH CAROLINA

RADIOFREQUENCY/ENVIRONMENTAL/OSHA STATEMENT

The following information is presented to conform the application to the lastest requirements as regard the NIER (Non Ionizing Electromagnetic Radiation) requirements as well as OSHA (Occupational Safety and Health Administration) rules in this regard.

The limit of exposure is 1.0 milliwatt per square centimeter. The applicant proposes to utilise a 5 bay antenna with the lowest bay at 7500 cm from ground level.

The distance to the biohazard is calculated as the square root of the following:

D (cm) to biohazard =[(1049∓6)(MERPH + MERPV)] / [pi] [0.01] ** 0.5
(per OET Bulletin 65) (MERPH is 6000 w, MERPV is 6000 w)

This distance for WOGR is calculated to be 20,028 cm or 21 meters from the lowest antenna bay. This is at least 54 meters from ground level, and 30 meters from the top of any structure in the vicinity. Casual or occupational exposure to the prohibited level of 1.0 mw/cm^2 is impossible with this installation.

The exposure at ground level is calculated as follows:

$S(mw/cm^2) = (0.64)(1.64)(MERPH + MERPV)(1000\ mw/w) / (pi)(dist^2)$

With a distance of 7500 cm the ground exposure is 0.0713 mw/cm^2. This exceeds not only ANSI C95.1 standards but the proposed standards for Massachusetts and Oregon.

With respect to an environmental impact statement, the site proposed is zoned in Mecklenburg County I-1 as is the entire area. The (see Exhibit 3) entire area is saturated with communications towers. The application is catagorically exempt from environmental processing.

OSHA and Occupational Exposure Statement

The proposed facility was evaluated under Further Guidance for Broadcasters Regarding Radiofrequency Radiation and the Environment. (FCC Public Notice, 79-144, Mimeo 2278, 28 January 1986)). The proposed operation is equivalent to Contingency 2 in that a biohazard would be produced as described above within 21 meters of the antenna system.

EXHIBIT 6
RADIOFREQUENCY/ENVIRONMENTAL/OSHA STATEMENT, PAGE 2
VICTORY CHRISTIAN CENTER, INCORPORATED
NEW FM, HARRISBURG, NORTH CAROLINA

The biohazard zone is not accessible to anyone unless they climb the tower to the 54 meter level. The tower will be fenced, locked, and interlocked such that plate power to the final radiofrequency amplifier will be removed when the tower locking fence is opened with a tamper-proof lockout system.

Moreover, OSHA lockout stations and approved NEMA-4 lockout circuit breakers will be installed such that a minimum of two employees can install lockout devices on the transmitter power supply (each with unique, individual key and lock) such that all personnel must be off the tower to unlock and engage the main power supply to the transmitter. [1]

In this way, the engineering staff will be able to enforce its present management rule that requires RF power to be totally removed from towers whenever tower work is required.

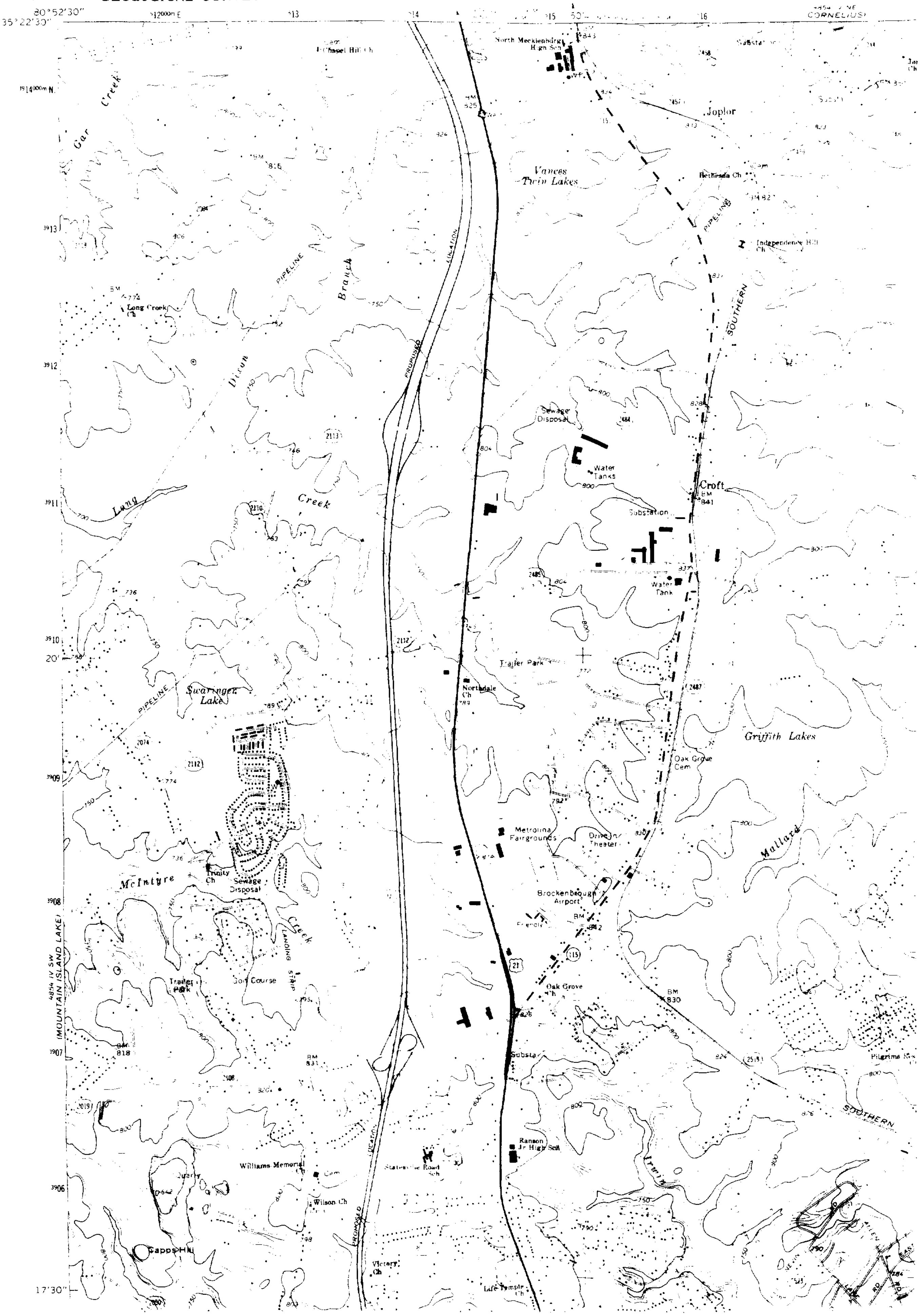
A continuing education program and management directives will ensure that there will be no occupational exposure to the radiofrequency biohazard in routine operation, and no occupational exposure to RF of any kind if the tower is being climbed and serviced using the present OSHA lockbox requirement.

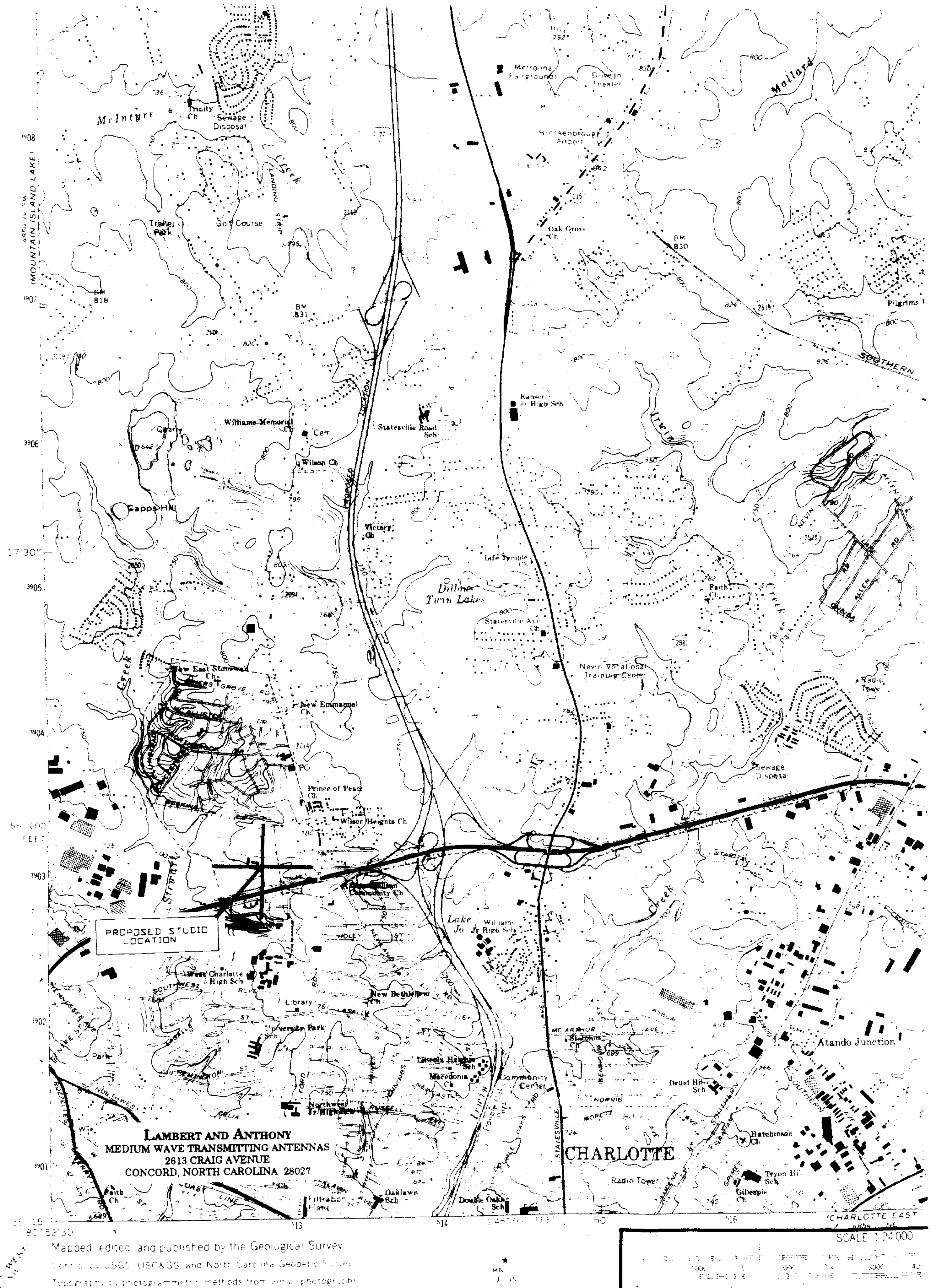
This operation is believed to be state of the art as regards protecting the general public, employees, engineering personnel, contractors, and their consultants from exposure to the radiofrequency biohazard. Victory Christian Center certifies that it will comply and exceed the requirements of FCC and municipal occupational law at the time of grant as regards NIER.

[1] Note also that the tower gate itself will remove an interlock from the transmitter providing a third, independent employee protection.


DERITA QUADRANGLE
NORTH CAROLINA – MECKLENBURG CO.
7.5 MINUTE SERIES (TOPOGRAPHIC)
CORNELIUS
HUNTERSVILLE
KANNAPOLIS
HARRISBURG
Jonahville Ch
Cem
Prosperity Ch
Substa
Jonahville Cem
Clarks
Creek
Stony
Mallard Creek Community House
Gravel Pit
Mallard
Creek
Creek
Creek
Pilgrim Rest
Rockwell Ch
SOUTHERN
Derita
Derita Mineral Spring
Delta
New Hampton Ch
Substation
N 35-17-22
W 80-45-36

UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY





Mapped, edited, and published by the Geological Survey

Control by USGS, USC&GS, and North Carolina Geodetic Survey

Topography by photogrammetric methods from aerial photographs taken 1968 and 1971. Field checked 1972

Supersedes map dated 1948

Polyconic projection. 1927 North American datum

10,000-foot grid based on North Carolina coordinate system

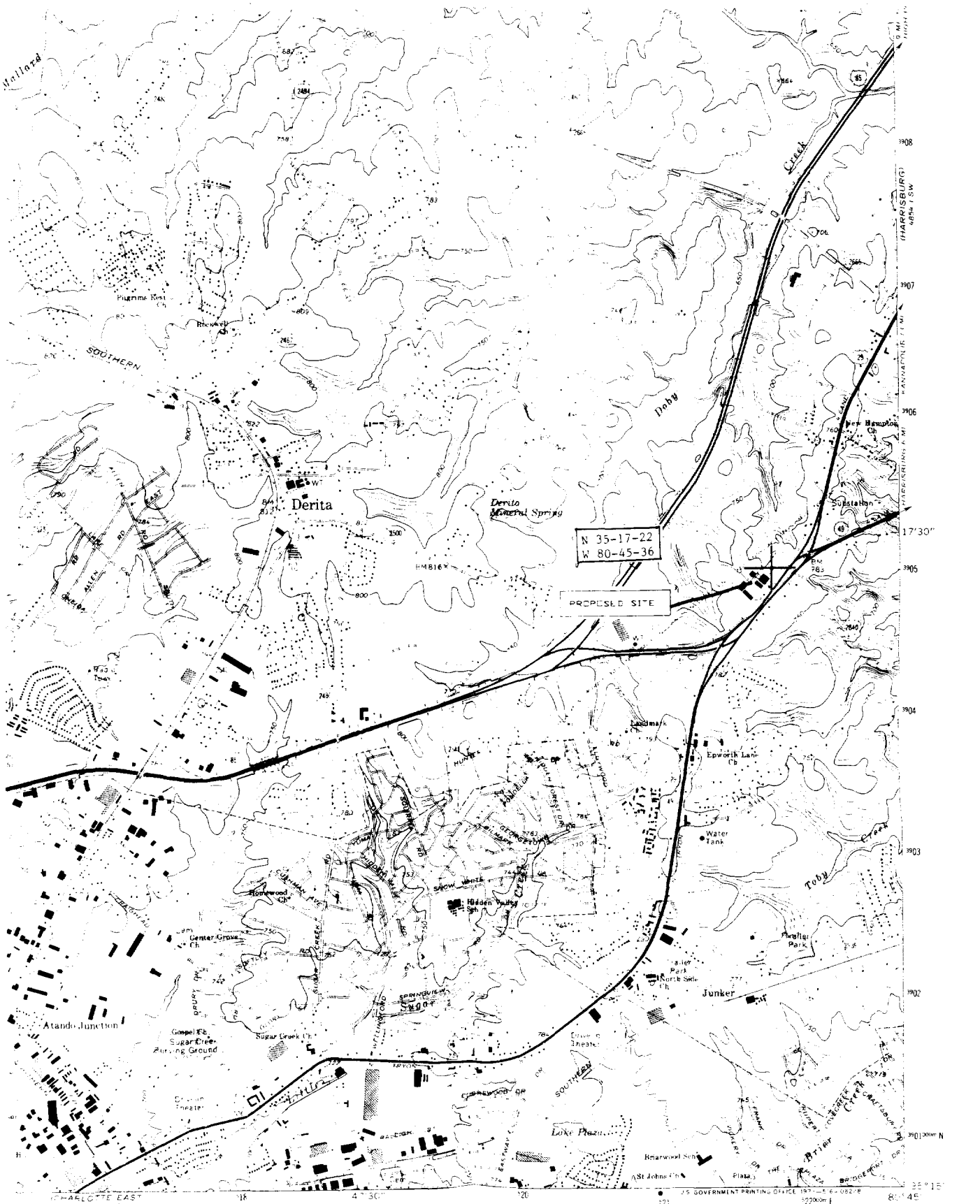
1000-meter Universal Transverse Mercator grid ticks, zone 17, shown in blue

Red tint indicates areas in which only landmark buildings are shown

UTM GRID AND 1972 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

CONTOUR INTERVAL 10
DATUM IS MEAN SEA LEVEL

THIS MAP COMPLIES WITH NATIONAL MAP A
FOR SALE BY U. S. GEOLOGICAL SURVEY, W
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMB



SCALE 1:24000

ROAD CLASSIFICATION

Primary highway, hard surface
Secondary highway, hard surface
Light duty road, hard or improved surface
Unimproved road
Interstate Route U. S. Route State Route

VICTORY CHRISTIAN CENTER, INC
NEW FM, Harrisburg NC

EXHIBIT 4 FIGURE 1

75 Minute Site Location Map
Derita, NC Quadrangle NAD-27

DERITA, N. C.
N3515—W8045/7.5

1972

AMS 4854 IV SE - SERIES V842

...A NATIONAL MAP ACCURACY STANDARDS
...S GEOLOGICAL SURVEY, WASHINGTON, D. C. 20242
...PHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

Federal Communications Commission
Washington, D.C. 20554

Approved by OMB
3060-0120
Expires 9/30/90

BROADCAST EQUAL EMPLOYMENT OPPORTUNITY

MODEL PROGRAM REPORT

1. APPLICANT

Name of Applicant	Address
Victory Christian Center, Incorporated	P.O. Box 240433 Charlotte, North Carolina 28224
Telephone Number (include area code) 704-527-8181	

2. This form is being submitted in conjunction with:

[XX] Application for Construction Permit for New Station

[ ] Application for Assignment of License

[ ] Application for Transfer of Control

(a) Call letters (or channel number of frequency) ..... Channel 224A

(b) Community of License (city and state) ..... Harrisburg, North Carolina

(C) Service:

[ ] AM [X] FM [ ] TV [ ] Other (Specify) _____

INSTRUCTIONS

Applicants seeking authority to construct a new commercial, noncommercial or international broadcast station, applicants seeking authority to obtain assignment of the construction permit or license of such a station, and applicants seeking authority to acquire control of an entity holding such construction permit or license are required to afford equal employment opportunity to all qualified persons and to refrain from discrimination in employment and related benefits on the basis of race, color, religion, national origin or sex. See Section 73.2080 of the Commission's Rules. Pursuant to these requirements, an applicant who proposes to employ five or more full-time employees must establish a program designed to assure equal employment opportunity for women and minority groups (that is, Blacks not of Hispanic origin, Asians or Pacific Islanders, American Indians or Alaskan Natives and Hispanics). This is submitted to the Commission as the Model EEO Program. If minority group representation in the available labor force is less than five percent (in the aggregate), a program for minority group members is not required. In such cases, a statement so indicating must be set forth in the EEO model program. However, a program must be filed for women since they comprise a significant percentage of virtually all area labor forces. If an applicant proposes to employ fewer than five full-time employees, no EEO program for women or minorities need be filed.

Guidelines for a Model EEO Program and a Model EEO Program are attached.

NOTE: Check appropriate box, sign the certification below and return to FCC:

[ ] Station will employ fewer than 5 full-time employees; therefore no written program is being submitted.

[XX] Station will employ 5 or more full-time employees. Our Model EEO Program is attached. (You must complete all sections of this form.)

I certify that the statements made herein are true, complete, and correct to the best of my knowledge and belief, and are made in good faith.

Signed and dated this 25th day of March, 1992

Signed Robyn G. Scott

Title President and Trustee

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND IMPRISONMENT. U.S. CODE, TITLE 18, SECTION 1001.

GUIDELINES TO THE MODEL EEO PROGRAM

The model EEO program adopted by the Commission for construction permit applicants, assignees and transferees contains sections designed to assist the applicant in establishing an effective EEO program for its station. The specific elements wh should be addressed are as follows:

I. GENERAL POLICY

The first section of the program should contain a statement by the applicant that it will afford equal employment opportunity all personnel actions without regard to race, color, religion, national origin or sex, and that it has adopted an EEO program wh is designed to fully utilize the skills of qualified minorities and women in the relevant available labor force.

II. RESPONSIBILITY FOR IMPLEMENTATION

This section calls for the name (if known) and title of the official who will be designated by the applicant to have responsibi for implementing the station's program.

III. POLICY DISSEMINATION

The purpose of this section is to disclose the manner in which the station's EEO policy will be communicated to employees a prospective employees. The applicant's program should indicate whether it: (a) intends to utilize an employment application for which contains a notice informing job applicants that discrimination is prohibited and that persons who believe that they ha been discriminated against may notify appropriate governmental agencies; (b) will post a notice which informs job applicants a employees that the applicant is an equal opportunity employer and that they may notify appropriate governmental authorities if th believe that they have been discriminated against; and (c) will seek the cooperation of labor unions, if represented at the tic in the implementation of its EEO program and in the inclusion of nondiscrimination provisions in union contracts. The a ca should also set forth any other methods it proposes to utilize in conveying its EEO policy (e.g., orientation materials, on-a announcements, station newsletter) to employees and prospective employees.

IV. RECRUITMENT

The applicant should specify the recruitment sources and other techniques it proposes to use to attract qualified minority an female job applicants. Not all of the categories of recruitment sources need be utilized. The purpose of the listing is to assis the applicant in developing specialized referral sources to establish a pool of qualified minorities and women who can b contacted as job opportunities occur. Sources which subsequently prove to be nonproductive should not be relied on and ne sources should be sought.

V. TRAINING

Training programs are not mandatory. Each applicant is expected to decide, depending upon its own individual situation, whether training program is feasible and would assist in its effort to increase the available pool of qualified minority and femal applicants. Additionally, the applicant may set forth any other assistance it proposes to give to students, schools or college which is designed to be of benefit to minorities and women interested in entering the broadcasting field. The beneficiary o such assistance should be listed, as well as the form of assistance, such as contributions to scholarships, participation in worl study programs, and the like.

MODEL EQUAL EMPLOYMENT OPPORTUNITY PROGRAM

I. GENERAL POLICY

It will be our policy to provide employment opportunity to all qualified individuals without regard to their race, color, religion, national origin or sex in all personnel actions including recruitment, evaluation, selection, promotion, compensation, training and termination.

It will also be our policy to promote the realization of equal employment opportunity through a positive, continuing program of specific practices designed to ensure the full realization of equal employment opportunity without regard to race, color, religion, national origin or sex.

To make this policy effective, and to ensure conformance with the Rules and Regulations of the Federal Communications Commission, we have adopted an Equal Employment Opportunity Program which includes the following elements:

II. RESPONSIBILITY FOR IMPLEMENTATION

(Name/Title) Wayne K. Hammond, General Manager will be responsible for the administration and implementation of our Equal Employment Opportunity Program. It will also be the responsibility of all persons making employment decisions with respect to the recruitment, evaluation, selection, promotion, compensation, training and termination of employees to ensure that our policy and program is adhered to and that no person is discriminated against in employment because of race, color, religion, national origin or sex.

III. POLICY DISSEMINATION

To assure that all members of the staff are cognizant of our equal employment opportunity policy and their individual responsibilities in carrying out this policy, the following communication efforts will be made:

[X] The station's employment application form will contain a notice informing prospective employees that discrimination because of race, color, religion, national origin or sex is prohibited and that they may notify the appropriate local, State or Federal agency if they believe they have been the victims of discrimination.

[X] Appropriate notices will be posted informing applicants and employees that the station is an Equal Opportunity Employer and of their right to notify an appropriate local, State or Federal agency if they believe they have been the victims of discrimination.

[ ] We will seek the cooperation of unions, if represented at the station, to help implement our EEO program and all union contracts will contain a nondiscrimination clause.

[ ] Other (specify)

IV. RECRUITMENT

To ensure nondiscrimination in relation to minorities and women, and to foster their full consideration whenever job vacancies occur, we propose to utilize the following recruitment procedures:

[X] We will contact a variety of minority and women's organizations to encourage the referral of qualified minority and women applicants whenever job vacancies occur. Examples of organizations we intend to contact are:

NAACP (Charlotte)
Urban League (Charlotte)
Women's Commission for Mecklenburg County (Charlotte)

[X] In addition to the organizations noted above, which specialize in minority and women candidates, we will deal only with employment services, including State employment agencies, which refer job candidates without regard to their race, color, religion, national origin or sex. Examples of these employment referral services are:

Employment Security Commission (Charlotte)

[X] When we recruit prospective employees from educational institutions such recruitment efforts will include area schools and colleges with minority and women enrollments. Educational institutions to be contacted for recruitment purposes are:

Johnson C. Smith University (Charlotte)
Queen's College (Charlotte)

[X] When we place employment advertisements with media some of such advertisements will be placed in media which have significant circulation or viewership or are of particular interest to minorities and women. Examples of media to be utilized are:

The Charlotte Post
The Charlotte Observer

[X] We will encourage employees to refer qualified minority and women candidates for existing and future job openings.

V. TRAINING

☒ XX Station resources and/or needs will be such that we will be unable or do not choose to institute programs for upgrading the skills of employees.

☐ We will provide on-the-job training to upgrade the skills of employees.

☐ We will provide assistance to students, schools, or colleges in programs designed to enable qualified minorities and women to compete in the broadcast employment market on an equitable basis:

School or Other Beneficiary	Proposed Form of Assistance

☐ Other (specify)

FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

The solicitation of personal information requested in this application is authorized by the Communications Act of 1934, as amended. The principal purpose for which the information will be used is to determine if the application requested is consistent with the public interest. The staff, consisting variously of attorneys, analysts, engineers, and applications examiners, will use the information to determine whether the application should be granted, denied, dismissed, or designated for hearing. If all the information requested is not provided, the application may be returned without action having been taken upon it or its processing may be delayed while a request is made to provide the missing information. Accordingly, every effort should be made to provide all necessary information. Your response is required to obtain the requested authority.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3) AND THE PAPERWORK REDUCTION ACT OF 1980, P.L. 96-511, DECEMBER 11, 1980, 44 U.S.C. 3507.